

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

DERIK DEANGELO, LUIS A. HERNANDEZ,  
CHAMBLIN GROUP REAL ESTATE VENTURES  
LLC and REISPEC DEVELOPMENTS LLC,

Plaintiffs,

v.

CESAR HUMBERTO PINA, WHAIRHOUSE  
HOLDINGS LLC, WHAIRHOUSE INVESTMENTS  
LLC, WHAIRHOUSE REAL ESTATE LLC,  
WHAIRHOUSE LIMITED LIABILITY COMPANY  
a/k/a WHAIRHOUSE LLC, WHAIRHOUSE  
COMMERICAL PROPERTIES LLC, FLIP THE  
DAO LLC d/b/a "FLIP 2 DAO," RAASHAUN  
CASEY a/k/a DJ ENVY, JENNIFER ITURRALDE  
PINA, LUIS PINA, FROM START 2 FLIPPING LLC,  
FROM START 2 FLIP CONSULTING 2 LLC, FROM  
START 2 FLIP CHICAGO LLC, CESAR, and DJ ENVY  
SEMINARS LLC, TAYLOR PINA, PAULA LLANOS,  
TAYLOR'S REAL ESTATE LLC, TAYLOR INVESTMENT  
GROUP LLC, FLIPPING AND TIPPING CONSULTING  
LLC, FLIPPING KEYS 2 LLC, LUCHIE CONSTRUCTION  
LLC, PINA MANAGEMENT LLC, LAND TRAP LORD LLC  
d/b/a "TRAP LAND LORD," 13910 WOODWORTH LLC,  
13604 EARLWOOD ROAD LLC, 3110 EAST 94TH STREET  
LLC, 11611 SAYWELL AVE LLC, 11831 UNION AVE LLC,  
14116 STRATHMORE AVE LLC, 1715 TAYLOR ROAD LLC,  
1842 COLONNADE ROAD LLC, 3549 EAST 151ST LLC,  
6003 THACKERAY LLC, 6615 CLARK AVE LLC, 799 EAST  
103RD STREET LLC and 8301 KORMAN AVE LLC,

Defendants.

: Civ. Action No.

: 23-CV-22655

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**NOTICE OF MOTION TO DISMISS**

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TO: All counsel of Record

DEAR SIR/MADAM:

PLEASE TAKE NOTICE that the undersigned attorney for all defendants but for Raashaun Casey a/k/a DJ Envy and Whairhouse Limited Liability Company a/k/a Whairhouse LLC will move before the above-named Court at the Federal Courthouse, Newark, New Jersey, on Monday, February 20, 2024, at 10:00 a.m. or as soon thereafter as counsel may be heard, for an Order dismissing the third amended complaint pursuant to Federal Rules of Civil Procedure 8, 9(b), and 12(b)(6).

PLEASE TAKE FURTHER NOTICE that in support of this motion plaintiff shall rely upon the pleadings in this matter and the brief submitted herewith.

PLEASE TAKE FURTHER NOTICE that oral argument is requested.

BY: S/Philip L. Guarino

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Counsel for All Defendants but for  
Raashaun Casey a/k/a DJ Envy and  
Whairhouse Limited Liability Company  
a/k/a Whairhouse LLC